

November 11, 2021

Re: Crass v. Yalla Group Limited, et al., Case No. 1:21-cv-6854 (PAE)

The Honorable Paul A. Engelmayer  
United States District Court for the Southern  
District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312

Dear Your Honor:

In accordance with Your Honor's individual practice rules and pursuant to this Court's November 8, 2021 Order directing the parties to file a joint letter setting out a proposed schedule, Lead Plaintiffs Yongjun Li and Peifa Xu and Defendant Yalla Group Limited respectfully request that this Court approve the attached Scheduling Stipulation and [Proposed] Order for the filing of Lead Plaintiffs' consolidated amended complaint, and filing and briefing of Defendants' motion to dismiss. If entered, the Scheduling Stipulation would require the Lead Plaintiffs to file a consolidated amended complaint by January 7, 2022, and Defendants to file a motion to dismiss by March 8, 2022. Plaintiff would file an opposition by May 9, 2022, and Defendants would file a reply by June 8, 2022.

There has been no prior deadline for the filing of a consolidated amended complaint and no requests for an adjournment or extension with regards to that deadline. Defendant Yalla Group's previous deadline to answer, move to dismiss, or otherwise respond to the current complaint in this action was September 7, 2021. The parties jointly submitted a letter motion requesting an adjournment or extension of time with regards to that deadline on September 2, 2021, which was granted on September 3, 2021. All parties who have appeared consent to this letter motion.

Respectfully submitted,

/s/ George S. Wang  
George S. Wang  
Counsel for Defendant Yalla Group  
Limited

The Honorable Paul A. Engelmayer

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November 11, 2021

/s/ Tamar Weinrib

Tamar Weinrib

Counsel for Lead Plaintiffs Yongjun Li  
and Peifa Xu

cc: All counsel of record (via ECF)

Encl.